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*ADMITTED IN NY & NJ

October 15, 2014

BY ECF and EMAIL

Hon. Laura Taylor Swain
United States District Judge
Southern District of New York
500 Pearl Street, Rm. 755
New York, NY 10007

Re: United States v. Annette Bongiorno, et al.,
S2 10 Cr. 228 (LTS)

Dear Judge Swain:

I write to request that the Court modify Mrs. Bongiorno's bail conditions to permit her to leave her residence early in the morning on October 27, so that she can arrive at the courthouse in time to participate in the hearing the Court has scheduled for that date.

As the Court is aware, Mrs. Bongiorno's bail requires that she be detained at home for 12 hours per day. The terms of her detention at home, as set by the pretrial services officer, require that she remain at home from 8 p.m. until 8 a.m. See Tr. 12,199.

The October 27 hearing is set for 9:30 a.m. For Mrs. Bongiorno to appear in the courthouse by that time, she will need to leave her home at approximately 7:00 a.m. Therefore, I respectfully request that the Court modify Mrs. Bongiorno's bail conditions to permit her to leave her house any time after 7:00 a.m. on October 27, 2014.

For the Court's information, Mrs. Bongiorno has attempted to contact her pretrial services officer to obtain consent to this application on several occasions, but has not received any response to her inquiries. This has necessitated the present application.

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If the Court is inclined to grant this application, it may do so by executing this letter at the "So Ordered" signature line below. If the Court grants this application, I will forward a copy of the Court's order to the pretrial services officer, so that she has been advised of the order.

Respectfully submitted,



Roland G. Riopelle

Cc: AUSAs Monteloni, Schwartz, Jackson and Zack (By ECF and Email)
All defense counsel (By ECF and Email)

The defendant, Annette Bongiorno, having made an application to modify the conditions of her bail to permit her to leave her home any time after 7:00 a.m. on October 27, 2014, for the purpose of attending the hearing scheduled in this matter on October 27, 2014 at 9:30 a.m., and good cause appearing to grant this application,

IT IS ORDERED, that the defendant, Annette Bongiorno, is hereby permitted to leave her home any time after 7:00 a.m. on October 27, 2014, for the purpose of attending the hearing scheduled in this matter on October 27, 2014.

SO ORDERED:

HON. LAURA TAYLOR SWAIN
U. S. D. J.